

**VOLUME 3 GENERAL TECHNICAL ADMINISTRATION****CHAPTER 54 PART 142 TRAINING CENTERS****Section 5 Safety Assurance System: Part 142 Training Centers: Outsource Training—Air Operators and/or Fractional Ownership Program Managers Contracting With Training Providers****Source Basis:**

- **Section 91.1027, Recordkeeping.**
- **Section 91.1073, Training Program: General.**
- **Section 91.1075, Training Program: Special Rules.**
- **Section 91.1079, Training Program: Curriculum.**
- **Section 91.1081, Crewmember Training Requirements.**
- **Section 91.1083, Crewmember Emergency Training.**
- **Section 91.1087, Approval of Aircraft Simulators and Other Training Devices.**
- **Section 91.1089, Qualifications: Check Pilots (Aircraft) and Check Pilots (Simulator).**
- **Section 91.1091 Qualifications: Flight Instructors (Aircraft) and Flight Instructors (Simulator).**
- **Section 91.1093, Initial and Transition Training and Checking: Check Pilots (Aircraft), Check Pilots (Simulator).**
- **Section 91.1095, Initial and Transition Training and Checking: Flight Instructors (Aircraft), Flight Instructors (Simulator).**
- **Section 91.1097, Pilot and Flight Attendant Crewmember Training Programs.**
- **Section 91.1099, Crewmember Initial and Recurrent Training Requirements.**
- **Section 91.1101, Pilots: Initial, Transition, and Upgrade Ground Training.**
- **Section 91.1103, Pilots: Initial, Transition, Upgrade, Requalification, and Differences Flight Training.**
- **Section 91.1105, Flight Attendants: Initial and Transition Ground Training.**
- **Section 91.1107, Recurrent Training.**
- **Section 121.401, Training Program: General.**
- **Section 121.402, Training Program: Special Rules.**
- **Section 121.403, Training Program: Curriculum.**
- **Section 121.407, Training Program: Approval of Airplane Simulators and Other Training Devices.**
- **Section 121.411, Qualifications: Check Airmen (Airplane) and Check Airmen (Simulator).**
- **Section 121.412, Qualifications: Flight Instructors (Airplane) and Flight Instructors (Simulator).**
- **Section 121.413, Initial, Transition, and Recurrent Training and Checking Requirements: Check Airmen (Airplane), Check Airmen (Simulator).**
- **Section 121.414, Initial, Transition, and Recurrent Training and Checking Requirements: Flight Instructors (Airplane), Flight Instructors (Simulator).**
- **Section 121.415, Crewmember and Dispatcher Training Program Requirements.**

- **Section 121.417, Crewmember Emergency Training.**
- **Section 121.418, Differences Training and Related Aircraft Differences Training.**
- **Section 121.419, Pilots and Flight Engineers: Initial, Transition, and Upgrade Ground Training.**
- **Section 121.421, Flight Attendants: Initial and Transition Ground Training.**
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- **Section 121.423, Pilot: Extended Envelope Training.**
- **Section 121.424, Pilots: Initial, Transition, and Upgrade Flight Training.**
- **Section 121.425, Flight Engineers: Initial and Transition Flight Training.**
- **Section 121.427, Recurrent Training.**
- **Section 121.683, Crewmember and Dispatcher Record.**
- **Section 125.401, Crewmember Record.**
- **Section 125.296, Training, Testing, and Checking Conducted by Training Centers: Special Rules.**
- **Section 125.297, Approval of Flight Simulators and Flight Training Devices.**
- **Section 135.63, Recordkeeping Requirements.**
- **Section 135.323, Training Program: General.**
- **Section 135.324, Training Program: Special Rules.**
- **Section 135.327, Training Program: Curriculum.**
- **Section 135.329, Crewmember Training Requirements.**
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- **Section 135.337, Qualifications: Check Airmen (Aircraft) and Check Airmen (Simulator).**
- **Section 135.338, Qualifications: Flight Instructors (Aircraft) and Flight Instructors (Simulator).**
- **Section 135.339, Initial and Transition Training and Checking: Check Airmen (Aircraft), Check Airmen (Simulator).**
- **Section 135.340, Initial and Transition Training and Checking: Flight Instructors (Aircraft), Flight Instructors (Simulator).**
- **Section 135.341, Pilot and Flight Attendant Crewmember Training Programs.**
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- **Section 135.345, Pilots: Initial, Transition, and Upgrade Ground Training.**
- **Section 135.347, Pilots: Initial, Transition, Upgrade, and Differences Flight Training.**
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- **Section 142.1, Applicability.**
- **Section 142.3, Definitions.**
- **Section 142.39, Training Program Curriculum Requirements.**
- **Section 142.47, Training Center Instructor Eligibility Requirements.**
- **Section 142.49, Training Center Instructor and Evaluator Privileges and Limitations.**

- **Section 142.53, Training Center Instructor Training and Testing Requirements.**
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- **Section 142.59, Flight Simulators and Flight Training Devices.**
- **Section 142.73, Recordkeeping Requirements.**
- **Section 142.81, Conduct of Other Approved Courses.**

**3-4409 GENERAL.** This section provides policy guidance for principal operations inspectors (POI) that have operators or receive requests from their operators to outsource a portion of their required crewmember training. The information in this section may also be useful for Training Center Program Managers (TCPM), operators, and training center managers (TCM). This section is related to Safety Assurance System (SAS) Element 2.1.4, Outsource Crewmember Training.

### **3-4410 BACKGROUND.**

**A. References.** In addition to adopting Title 14 of the Code of Federal Regulations (14 CFR) part 142, the Federal Aviation Administration (FAA) also revised applicable sections of 14 CFR parts 61, 63, 91 subpart K (part 91K), 121, 125, 135, and 141 to provide a means for crediting the training, testing, and checking accomplished in flight simulation training devices (FSTD) toward the flight training requirements of those parts. The adoption of part 142 enabled operators to pursue training alternatives not previously available under the regulations. Part 142 has made the use of training centers by operators more widely accepted as an alternative means of providing training to its employees.

NOTE: “Alternative means” as used in part 142 has in some cases been misunderstood and has been interpreted to mean that compliance with a training center’s approved courses will meet the training requirements required by the appropriate operating rules for an operator. This is not the case.

“Alternative means” permits an operator to outsource or arrange to have its approved training conducted by a third party. It does not mean that an operator has an “alternative means” to meet the training approval requirements governing its particular operation. Programs approved in accordance with part 142 may not be used as an alternative means of satisfying the requirements of the appropriate operating rules as approved by the operator’s POI.

**B. TCPMs and POIs.** As the use of training centers continues to increase, the interrelationship between a center’s TCPM and an operator’s POI have become increasingly important. When an operator wishes to use the services of a part 142 training center, the most common operational issues that POIs must resolve—and this section will address—are outlined below:

- 1) Exactly what portion of the operator’s required crewmember training, checking, and/or testing will the center be authorized to conduct?
- 2) What qualification requirements are necessary to enable training center flight instructors to conduct the requested training? (Refer to part 91, §§ 91.1091 and 91.1095; part 121, §§ 121.412 and 121.414; and part 135, §§ 135.338 and 135.340.)

3) How does the operator propose to qualify Training Center Evaluators (TCE) or other personnel to become contract check airmen? (Refer to §§ 91.1089, 91.1093, 121.411, 121.413, 135.337, and 135.339.)

4) What documentation is required to ensure the training conducted by the center complies with the operator's approved curriculums, and how does the operator propose to document this training?

### **3-4411 BASIC STRUCTURE.**

**A. Operating Rules.** The operating rules of parts 121, 125, 135, and 91K permit operators to use the services of another operator certificated under the same part or a certificated part 142 training center to conduct some or all of their required crewmember training. If approved by the operator's POI, an operator may use the training provider's facilities, equipment, and personnel to varying degrees to accomplish the training, checking, and testing required by their approved training program.

**B. Training Curriculum.** Regardless of who actually developed an operator's training curriculum, the operator is responsible for its approval, oversight, content, and currency. Regulations are very clear regarding an operator's requirement to have appropriate crewmember training programs that support their particular operation. The regulations are also clear concerning the requirement to have these programs approved by the Administrator. In the case of the operator, this approval is delegated to the operator's POI. In similar fashion, training centers certificated under part 142 are also required to have their curriculums approved by the Administrator. For training centers, the approval authority is delegated to the center's TCPM.

**C. Arrangements.** The following cases are the two most common arrangements that are formed between air carriers and training centers.

#### **1) Case One—Dry Lease.**

a) The least complicated way in which an operator may use the facilities and equipment of a training center is through a "dry lease" agreement. In this case, the operator has developed and maintains its own approved training curriculum, associated courseware, materials, checklists, procedures, and personnel to conduct training and checking, but elects to dry lease flight training equipment and facilities from a training center. Associated airman certification functions and proficiency requirements are completed by check airmen employed by the carrier (not the training center), the operator's aircrew program designee (APD), or the FAA. The operator accomplishes recordkeeping, although required training records may be maintained at the training facility if approved by their POI. POIs will make all enhanced Vital Information Database (eVID) entries concerning the operator's check airman activities. The operator's POI approves the use of the center's flight training equipment; however, the operator is responsible for ensuring that the center's equipment and facilities continue to meet the standards required to accomplish required training. The training center simply acts as a host for the operator and center personnel are not involved in the training or checking of the operator's crewmembers.

b) POIs are responsible for providing required surveillance to determine if contracted facilities and training equipment meet the requirements for continued approval.

Due to the center's physical location in relation to the POI's office, the POI may request the center's TCPM to provide information concerning the training center facility and equipment, as well as assistance in performing required surveillance.

c) Operators who conduct training in this manner (dry lease) are not outsourcing their training from another training provider and therefore do not require approval for outsourced training in their Operations Specification (OpSpec)/Management Specification (MSpec)/Letter of Authorization (LOA) A031, Outsourced Training.

**2) Case Two—The Training Center Provides Facilities, Instructors, and/or Evaluators Under Contract to the Operator.**

a) The second most common way operators use the services of part 142 training centers is to enter into an agreement with the center to provide instructors and/or evaluators to act on behalf of the operator in the conduct of the operator's training curriculum. In this situation, the operator may have developed their own training curriculum, hired a consultant to develop the curriculum, or adopted the training center's curriculum. Regardless of the source, each curriculum must be approved by the operator's POI for their use. However, it is not uncommon for operators to adopt one of the center's core or specialty curriculums and submit it without revision, to their POI for approval. Prior to submitting a center-developed curriculum to their POI for approval, the operator must conduct a detailed review and comparison and analysis of the center's curriculum, courseware, procedures, equipment, and personnel to determine if the training center's curriculum will meet their operational needs. If the operator determines that the center's curriculum will meet their needs, they may submit it to their POI for approval. If the POI accepts the submitted curriculum and grants approval, the curriculum becomes part of the operator's approved program, and in effect becomes the operator's curriculum. This trend is particularly evident among part 135 and new entrant part 121 operators for whom the development of a complete in-house pilot qualification program using modern FSTDs often entails prohibitive costs and logistics.

b) Training center personnel (flight instructors) conducting flight training activities for an operator must be trained and qualified in accordance with the air carrier's approved program to become eligible to conduct training under the air carrier's approved curriculum (§§ 121.412 and 121.414; §§ 135.338 and 135.340; or §§ 91.1091 and 91.1095, as appropriate). If an air carrier wishes to have the center provide flight checking or testing services, the air carrier must ensure nominated individuals are trained and qualified as a check airman in accordance with their approved training program (§§ 121.411 and 121.413; §§ 135.337 and 135.339; or §§ 91.1089 and 91.1093, as appropriate).

c) The center may maintain the operator's training records if approved by the POI. However, the responsibility for the adequacy of the records remains with the operator, not the training center.

d) If the operator elects to nominate one or more of the center's personnel to act as a contract check airman, and the operator's POI authorizes such check airmen, the POI must maintain all check airman entries in the eVID. In other words, whether an operator uses their own personnel as check airmen (as outlined in Case One) or elects to use center employees as contract check airmen, all required eVID entries relating to check airmen will be made by the POI. This will help ensure that both the POI and the operator maintain proper operational control over persons performing check airmen/contract check airmen functions.

e) The POI must be assured that the center's facilities and equipment are adequate to conduct the training the operator is proposing. The center's TCPM is one of the POI's best sources of information to enable him/her to make the determination that the center's facilities and training equipment are adequate for the proposed operation and to assist with required surveillance activities.

f) Operators who wish to engage a training center to accomplish the aircraft-specific training modules of their curriculum create special surveillance requirements. The division of an operator's required training between the operator and a training center creates a unique recordkeeping situation, as well as specialized training for the center instructors. POIs must be extremely vigilant in determining who is accomplishing each element of the operator's program and that the complete program is accomplished. POIs should communicate regularly with the training center's TCPM and are encouraged to request assistance with surveillance of the operator's activities at the training center. The TCPM's assistance will typically afford the POI greater flexibility and a higher level of surveillance than would normally be possible without the TCPM's assistance. An operator should develop and keep up to date a "Training Source Document" or similar statement detailing what training will be provided in house and what will be conducted by the training center. See the FAA's Air Transportation Division (AFS-200), Air Carrier Training Systems and Voluntary Safety Programs Branch (AFS-280) website for a sample of such a document.

**3-4412 PART 142 APPROVED CURRICULUMS.** A short review of the various types of training center curriculums and their approval process will assist with our understanding of the appropriateness of these curriculums for use by an operator. It is important to emphasize that a center's approved curriculum may not be used by an operator without first being evaluated for appropriateness and secondly, being approved for use by the operator's POI.

#### **A. Core Curriculum.**

1) A core curriculum is a training center-developed course that is approved by the Administrator (through the TCPM) for the purpose of meeting the training and certification requirements of airmen under parts 61 and/or 63. (Refer to part 142, § 142.3.)

2) In order for a training course to be approved as a core curriculum it must:

a) Meet the applicable requirements of part 142 subpart B and part 61 or 63;

b) Contain all the events and maneuvers required by the appropriate practical test standards (PTS) or Airmen Certification Standards (ACS) for the issuance of the particular Airman Certificate for which the curriculum was designed;

c) Meet the requirements of the Flight Standardization Board (FSB) report for that specific aircraft;

d) Consist of training segments that identify training and testing requirements for the issuance of a particular certificate;

e) Follow the guidance in Volume 3, Chapter 54, Section 6, Part 142 Training Centers: Evaluate Training Programs, Curriculums, Flight Training Equipment, and Recordkeeping Requirements and Volume 3, Chapter 19, Section 5, Safety Assurance System: Flightcrew Aircraft Ground Training Curriculum Segments concerning ground and flight training threshold hours; and

f) Include maneuver descriptions, standard operating procedures (SOP), checklists, and other supporting courseware.

3) Part 142 pilot training curriculums are designed to meet the certification requirements of part 61 and therefore do not include many of the operator-specific elements required by the operating rules associated with an air carrier/operator. For example, a part 142 core curriculum does not require a training center to specify the training that is normally found in an operator's OpSpecs, such as authorized takeoff or landing minimums, types of authorized approaches, and captain high minimum requirements. Additionally, ground training in areas such as hazardous materials (hazmat) handling, security, aircraft maintenance, logbook procedures, and flight following is also not required to be part of a part 142 training center's core curriculum. Although a training center's part 142 approved core curriculum may meet the aircraft-specific requirements for an operator, these curriculums do not qualify operator's pilots for line operations and may not be used by an operator without the specific approval of the operator's POI.

**B. Specialty Curriculums.** This term refers to courses that are designed to satisfy a particular requirement of 14 CFR chapter I (parts 1–199), other than airman certification under parts 61 and 63. The Administrator (through the TCPM) is authorized to approve specialty curriculums for use by a training center and, if appropriate, associated satellite and/or remote sites (refer to § 142.3). Training centers often develop specialty curriculums to meet the specific needs of a particular customer. Some examples of specialty curriculums include (but are not limited to) Category II/III authorization, equipment differences training, night vision goggles (NVG) and so forth. Specialty curriculums can vary widely in focus and subject matter and may be developed for personnel other than flightcrew members (refer to § 142.81). The approval of specialty curriculums or courses by a training center's TCPM, however, does not enable those curriculums or courses to be used by an operator without the specific approval of the operator's POI.

**3-4413 ROLES, RESPONSIBILITIES, AND COORDINATION.** The safety, efficiency, and quality of training provided by training centers, through the use of structured programs and FSTDs, has proven to be an effective and economical means for some operators to accomplish required training. Consequently, a number of operators have come to rely on part 142 training centers as a source of technical expertise and as their primary training provider. As the use of approved training centers continues to expand, it becomes increasingly important to understand

the roles, responsibilities, and coordination activities required of each participant. Subparagraphs A through D of this paragraph that emphasize the regulatory roles and responsibilities, as well as the coordination required between operators and training centers when an operator is using a training center to conduct a portion of their required training program. Subparagraphs A through D of this paragraph do not focus on day-to-day activities associated with the surveillance of training centers or operators outside of the context and scope of this section. It is presumed that these activities are being conducted in accordance with the guidance located elsewhere in this chapter, associated regulations, orders, and policy guidance.

**A. Air Operators.** The regulatory responsibility for ensuring that an operator's training program remains current and continues to meet the operator's needs resides with the operator, not the training provider. When an operator makes application to use the services of an authorized training provider they must:

1) Ensure that all training, testing, and/or checking to be conducted by the training center has been approved by the POI before any training is accomplished.

2) Develop an instructor/check airman standardization program including a checklist, which clearly identifies those elements of the operator's program that are to be completed by the training center and those that are to be completed by the operator. This checklist must specifically identify each training element that will be conducted by the center and include the regulatory and/or the training program reference for each item.

NOTE: A sample air operator standardization review may be found on the AFS-280 website. The sample program is designed to be all-inclusive and therefore not every item covered in the sample may be applicable to all operators. The sample is intended to be comprehensive and include sufficient detail to ensure the training provider has an accurate understanding of the operator's training requirements. The FAA suggests that each subject in the sample standardization program be reviewed with a potential training provider to ensure a complete understanding of each party's role.

3) Develop an implementation plan to perform oversight of center facilities and personnel engaged in the conduct of the operator's training and associated evaluations. The operator's implementation plan must:

a) Ensure that all training center personnel selected to act as contract instructors (both ground and flight) and/or contract check airmen are appropriately trained and qualified. Flight instructors and/or check airmen must be qualified in accordance with the operator's approved program. (Refer to §§ 91.1089 through 91.1095; §§ 121.411 through 121.414; and §§ 135.337 through 135.340, as appropriate.)



NOTE: Operators must complete a detailed comparison between their check airman curriculum and that of the training center's TCE curriculum to determine what, if any, additional training must be provided to qualify the center's personnel to act as a contract check airman. Elements of the center's instructor/TCE training curriculum that the operator finds equivalent to their training program may, with the POI's approval, be credited toward the completion of the operator's instructor/check airman curriculum. If the center's curriculum is approved as meeting the requirements of the operator's curriculum, other than the operator-specific items, no additional training for the center's personnel would be required. Any differences or deficiencies noted will require the operator to develop a training module to ensure all regulatory requirements are met and to qualify the center's personnel as contract check airman. This module that includes the operator-specific subjects must be presented to the operator's POI for approval/acceptance.

b) Provide the center with appropriate administration procedures and instructions to be used in the accomplishment of agreed training.

c) Provide for the oversight of all contract center personnel who are authorized to conduct training, testing, and/or checking on behalf of the operator.

4) Additionally, the following procedures must be followed when requesting the use of center personnel to become qualified as contract check airmen:

NOTE: These procedures follow the guidance outlined in Volume 3, Chapter 20, and should be accomplished in the order shown.

a) Evaluate the instructor/TCE's credentials to ensure he or she meets company requirements to become a contract check airman;

b) Evaluate the individual's training record to determine the differences training required to qualify the individual as a contract check airman;

c) Develop an appropriate training differences module(s) to qualify the center's instructor/TCE as a contract check airman and submit the training module to the POI for acceptance/approval; and

d) Conduct and record appropriate check airman training; submit the individual's name, short résumé, and training records to the POI for review and approval in accordance with Volume 3, Chapter 20.

NOTE: POIs should notify the center's TCPM whenever they authorize one of the center's personnel to act as a contract check airman by forwarding the TCPM a copy of the contract check airman's LOA.

5) Coordinate the approval of FSTD missing, malfunctioning, or inoperative (MMI) equipment procedures that will be used in support of the operator's curriculum.

**B. POIs.**

1) When an operator requests the use of a training center's facilities, FSTDs, curriculums (core and/or specialty), flight instructors, TCEs, and/or other services, including recordkeeping, the POI is responsible for determining the operator's request conforms to the appropriate regulations, policies, and procedures.

2) The approval authority for an operator to conduct training at a training center resides with the operator's POI, and must conform to the training program approval process outlined in Volume 3, Chapter 19. If an operator wishes to use a training center's core and/or specialty curriculums to meet a portion of their required training program, it is the operator's responsibility to ensure:

- a) The center's curriculums/courses meet the operator's training requirements.
- b) The curriculums are submitted to the operator's POI for review and approval in accordance with the procedures outlined in Volume 3, Chapter 1, Section 1.
- c) The curriculums are integrated into the operator's training program.

NOTE: If the curriculums are approved for the operator's use, these curriculums now become a portion of the operator's approved training program, and the maintenance/currency of those curriculums becomes the responsibility of the operator, not the training center.

3) If an operator applies to have the same training curriculum conducted by two or more centers (either operated by the same or a different training provider/company), the operator must develop an implementation plan for each center and ensure that each of the approved centers conducts their training curriculum using the operator's approved training curriculum (including maneuvers, procedures, and checklists). Additionally, each center must be specifically approved for use by the POI and listed in the operator's OpSpec/MSpec/LOA A031. It is the responsibility of the operator to ensure that all required software and hardware approved to support the subject curriculum is available and used by each center during the delivery of their training curriculum. See subparagraph 3-4414D below for additional guidance.

NOTE: POIs should notify the center's TCPM whenever they authorize one of the center's personnel to act as a contract check airman. This may be accomplished by forwarding the TCPM a copy of the contract check airman's LOA. POIs are encouraged to contact the center's TCPM for assistance with the review and potential approval of a contract check airman. TCPMs are often the POI's best source of information relating to a center's operation and personnel. A sample contract check airman LOA is located on the AFS-280 website.

4) When an operator requests approval of a training provider's personnel, to act as contract instructor and/or contract check airman to conduct a portion of their required training, it is the operator's responsibility to ensure those individuals are qualified to conduct the subject training. Prior to authorizing a center's flight instructors or TCE(s) to conduct any portion of an operator's training, the operator must qualify each individual in accordance with the training and testing requirements of their operating rule and provide sufficient evidence of such training and checking to the POI for review and approval.

5) Sections 121.414(a)(2), 135.340(a)(2), and 91.1095(a)(2) require an observation of each authorized flight instructor to be accomplished at least once every 24 months. Additionally, §§ 121.413(a)(2), 135.339(a)(2), and 91.1093(a)(2) require an observation of each simulator and aircraft check airman to be accomplished at least once every 24 months.

NOTE: Part 142 has similar requirements for flight instructors and evaluators. However, part 142 requires these observations to be conducted at least once every 12 months. (Refer to §§ 142.53(a)(1) and 142.55(a)(2).)

a) The intent of these regulations is to ensure the continued standardization and quality of each operator's training program by performing periodic observations of each flight instructor and check airman by focusing on the individual's performance in conducting a representative part of a curriculum or training program approved for that operator.

b) A qualified inspector or APD may be requested to observe contract flight instructors and contract check airmen on behalf of the POI. Whether conducting its own training or contracting for training with a training provider, each operator must ensure that all required observations are accomplished and documented. A training center's part 142 observations of their flight instructors may meet the requirements for the center under part 142, but not meet the requirements for an air carrier under part 121 or part 135. Such an observation might be acceptable for a portion of an operator's requirements under the following conditions:

1. When the training curriculum or curriculum segment conducted by the training center is essentially the same as that of the operator.

NOTE: Training program components may be viewed as "essentially the same" when they comprise identical checklists, operational procedures, and callouts, and flight deck layouts and flight manuals (fm) which are compatible in the judgment of the operator's POI. Training program components, which relate to like-aircraft types, are dissimilar when they do not meet the criterion for "essentially the same." When differences are too pronounced or too numerous in the judgment of the POI, flight deck layouts and fm must not be viewed as compatible.

2. When the observation is acceptable to the operator's POI.

c) An observation conducted by the FAA is always permissible instead of an observation conducted by an approved check airman or by a Designated Examiner (DE) employed by the operator. An observation by an FAA inspector counts toward the observation requirements of all operators contracting for training program services provided by a training center. POIs and TCPMs may conduct an observation at any time at their discretion. It is anticipated that operators and training centers will exchange information regarding observations of their instructors. However, it is the responsibility of the operator to ensure that all required observations are kept current and are documented.

**6)** Conduct training center surveillance to determine continued compliance with the operator's approved program.

**7)** If the operator requests approval of two or more centers, determine that all training, testing, and checking is conducted using the operator's approved curriculum. To ensure standardized training for all of the operator's crewmembers, it is essential that, before authorizing multiple sources of training, the operator provides the POI with a surveillance plan to ensure continued compliance with their approved curriculum by all centers. Each authorized training center must conduct the operator's curriculum as approved by the operator's POI and be alike in content, training times, maneuver descriptions, procedures, checklists, and FSTDs. If a training center is providing the same training program to two or more operators at the same center, it may be permissible (with the operator's permission) to interchange crewmembers during the flight training phase. This may only be accomplished providing the individual operator's training curriculums are essentially similar, including aircraft checklist, flows, emergency procedures, and profiles. In this example, two separate but identical programs are being accomplished simultaneously.

**8)** Determine that FSTDs are appropriate to, and representative of, the aircraft being operated by the air carrier. Flight training equipment must be specifically qualified and approved for the operator's use, as well as each maneuver, procedure, or crewmember function to be trained.

**9)** Each training facility must be authorized and listed in the operator's OpSpec/MSpec/LOA A031.

**10)** Each training curriculum/module approved to be conducted by a training provider must be listed, by curriculum title, in the operator's OpSpec/MSpec/LOA A031.

**11)** Review the operator's instructor/check airman standardization program.

NOTE: A sample instructor/check airman standardization program can be found on the AFS-280 website.

**12)** Review the operator's training center audit program.

**13)** Ensure that required airman training records meet regulatory requirements. If requested by the operator, the POI may permit the training provider to maintain the operator's crewmember training records. However, the operator must be advised that they (the operator) remain responsible for the security, accuracy, and availability of all required records. Permitting a training center to maintain operators' records does not relieve the POI of required check airman/APD tracking requirements outlined elsewhere in this order or the POI's office Quality Management System (QMS) policies.

**C. TCPMs.** From time to time, TCPMs may be called upon to assist a POI whose operator is using the services of a training center. The TCPM's firsthand knowledge of center personnel, facilities, equipment, and curriculums is a valuable resource that POIs have come to rely on. This knowledge enables TCPMs to:

**1)** Provide the POI information regarding the status and approval level of FSTDs and the installed equipment used by center instructors and TCEs;

**2)** Assist the POI by providing technical information regarding the center's curriculums, FSTDs, and facilities; and

NOTE: TCPMs should advise the POI of any status change involving an instructor or TCE that is also approved as a contract check airman for an operator.

**3)** Assist the POI with the evaluation of TCEs or other training center personnel nominated by the operator to become contract check airmen or flight instructors. The procedures outlined in Volume 3, Chapter 20, will be followed when evaluating center personnel as potential contract check airman candidates. Aviation safety inspectors (ASI) (e.g., TCPMs) must use the following Program Tracking and Reporting Subsystem (PTRS) codes to document surveillance of contract check airmen:

- Check Pilot Observation—Proficiency Check Oral or § 135.293(a) Knowledge Test (or any portion thereof): 1641.
- Check Pilot Observation—Proficiency or Competency Check (Simulator): 1642.
- Check Pilot Observation—Proficiency or Competency Check § 135.293(b) or § 135.297 (Aircraft): 1643.

NOTE: If the TCPM is observing a TCE, then a PTRS activity using code 1673 (for a TCE observation) should also be completed whether a check pilot observation is being completed or not.

**4)** Assist the POI with required surveillance activities including:

- a) Potential contract check airmen;
- b) Observing contract check airman during the evaluation of the operator's airman to ensure evaluations are objective, accurate, and consistent with the operator's program;

c) Evaluation of required crewmember training records that were authorized to be maintained by the training center; and

d) Other surveillance activities appropriate to the operator's activities at the training center.

NOTE: In all cases, the TCPM's assistance is subject to their office's workload requirements.

**D. Training Center(s).** A training center's roles, responsibilities, and coordination activities include:

1) Participating in the operator's instructor/check airman standardization program to ensure there is a clear understanding between the center and the operator of exactly what portions (by regulation) of the operator's approved curriculums the center will be conducting.

2) Ensuring the operator has received approval from their POI to use center facilities and personnel in the conduct of their approved curriculums.

3) Establishing a naming convention that will enable operator-approved curriculums/courses to be distinguished from center-approved curriculums. Operator programs are not to be referred to as core or specialty, as these terms are only appropriate for TCPM-approved center curriculums/courses.

NOTE: Training centers are not required to list operator names or the operator curriculums/courses in the center's training specifications (TSpec). Only the center's TCPM-approved core or specialty curriculums/courses are required to be listed in the center's TSpecs.

4) Ensuring that all center personnel used to instruct and/or check on behalf of the operator have been appropriately trained, evaluated, and authorized in accordance with the operator's approved curriculums to conduct such activities. This training must include, at a minimum, training in all portions of the operator's curriculums for which the contract instructors/check airmen are assigned to conduct on behalf of the operator.

5) Ensuring that sufficient contract instructors are qualified to support the operator's training agreement and requirements.

6) Recommending (not qualifying) center personnel as potential contract check airmen. The center must ensure recommended individuals:

a) Have completed the center's approved instructor training program, and

b) Are currently qualified and actively participating in one or more of the center's core curriculums appropriate to the operator's needs.

7) Maintaining the center's FSTDs in accordance with their qualification standards.

NOTE: If a Simulator Component Inoperative Guide (SCIG) has been developed for a particular full flight simulator (FFS), and the training agreement with an operator includes FFS training, make sure the SCIG has been approved for the operator's use.

8) Advising the operator whenever flight training equipment fails to meet required qualification standards and/or when maintenance problems will restrict training.

9) Ensuring required training records are appropriately maintained and remain readily available to both the Administrator and operator.

10) Ensuring crew pairing policies and procedures are adhered to as it relates to the operator's training and testing/checking.

NOTE: Crew pairing policies and procedures may be found in paragraph 3-4414 below.

11) Advising operators of any proposed revisions to the center's curriculums that are being used partially or in total by the operator.

### **3-4414 OUTSOURCED TRAINING PROVIDER APPROVAL PROCESS.**

#### **A. Application to Outsource Required Crewmember Training.**

1) Operators requesting approval to outsource a portion of their required flightcrew member training must submit an application in a form and manner prescribed by the Administrator. The application must contain sufficient detail to enable the Administrator to evaluate the applicant's request. Applications must be submitted a minimum of 60 days prior to the proposed training and contain at least the following information:

a) A copy of the standardization review including an analysis of the training provider's curriculums, courseware, procedures, equipment, facilities, and personnel that will be used in the conduct of the operator's training.

b) A detailed outline, by regulatory reference, of the training elements proposed to be outsourced.

c) If center personnel will be used as contract instructors to conduct the operator's training, the application must contain an appropriate training module developed to qualify center's instructors/TCEs on the operator's curriculum.

d) If center personnel are being requested to act as contract check airmen, the application must contain an appropriate training module developed to qualify center's instructors/TCEs as contract check airmen for the operator. (See paragraph 3-4415 for complete details.)

e) A copy of the operator's instructor/check airman standardization program.

f) A copy of the operator's proposed surveillance plan to ensure the center continues to provide the agreed training.

g) Proposed method to maintain required crewmember, contract instructors, and contract check airmen training records, including the methodology proposed to ensure curriculum revisions and an appropriate instructor/check airman read file are maintained.

h) Other data that the POI may require to evaluate the application.

2) The approval for an operator to use a part 142 training center or other provider in the conduct of their required training is authorized through the issuance of OpSpec/MSpec/LOA A031. An initial standardization review must be conducted by the operator and submitted to the POI before any contract training or checking may be conducted. OpSpec/MSpec/LOA A031 also requires the operator to conduct ongoing audits of the training center/provider to ensure the training center is continuing to provide training and checking in accordance with the operator's approved program. The initial audit must be completed within 60 days of the commencement of contract training or checking operations. Each audit with evaluation must be presented to the certificate holder's POI for review and acceptance within 30 days after completion. Ongoing audits will be conducted at least every 24 months in order for the operator to continue to use the training center/provider. Guidelines for the scope and content of the operator standardization and audit program are located on the AFS-280 website. Additional information is contained in paragraph 3-4416. If an operator does not conduct the required 24-month audit, their authorization to use the training center/provider will cease on the last day of the 24th month following the date of their last audit. Operators may reapply to use the training center/provider by completing the application process outlined in accordance with the provisions of subparagraph 3-4414A above.

3) A sample outline of the modules and elements of an operator's curriculum that are typically contracted out to a training center can be found on the AFS-280 website. These curriculum checklists have been developed to provide a guideline for the operator and center in determining which regulatory requirements may be satisfied by the training provider and which will be completed by the operator.

## **B. Flight Training Equipment.**

1) In order to receive training/checking/testing credit for the use of a FSTD, the specific FSTD must be a part of the operator's approved curriculum. The subject curriculum and FSTD are a part of the outsourced training audit and must include a comparison of the aircraft flown by the operator to the flight training equipment available at the training center. The comparison should encompass the make, model, and series (M/M/S) (and serial number, in some cases) of the aircraft and FSTD and include a summary of the flight instrumentation, autopilot, flight management system (FMS) equipment, aircraft modifications (electrical system, hydraulic system, engines, propellers, thrust rev, heads-up display, etc.) applicable to each. Regulations require that the flight training equipment fully meet the requirements of the operator's training program and accurately represent the M/M/S of aircraft flown by the operator, including installed equipment. If the flight training equipment available at the training center does not match the operator's aircraft, the operator's program must state how any differences



between the aircraft and the FSTDs will be addressed and develop an appropriate differences training module.

2) A TCPM's approval of a center's FSTDs for use within the center's approved curriculum does not authorize an operator to use the same FSTDs within the operator's curriculum. The TCPM's approval only ensures that the FSTDs are approved to conduct the training, testing, and checking permitted under part 142. In order for an operator to use a center's FSTDs in support of the operator's curriculum, the operator must include the FSTDs in its training program and have the FSTDs approved by its POI. The operator's POI will evaluate the requirements of the operator's program and make a determination concerning the appropriateness of the center's FSTDs and their qualification as it relates to the operator's curriculum. POIs may request verification of the flight training equipment authorized for use by a training center by contacting the center's TCPM.

3) To receive training credit for a particular FSTD, the FSTD must first be qualified by the National Simulator Program (NSP) (AFS-205) and be assigned a specific level of qualification. TCPMs and POIs may then approve the FSTD for use by a center or operator respectively, by specific maneuver(s), procedure(s), and crewmember function(s). Approval letters are generally issued to operators and centers specifying the FSTD's use within a specific curriculum. Operators are authorized the use of FSTDs through the inclusion of the FSTDs in their training program.

### **C. Approving/Accepting a Center's Core or Specialty Curriculums for Use by an Operator.**

1) Training centers often submit programs to their TCPM for approval that are targeted for specific customers and/or operators. However, these curriculums must meet part 142 requirements and are either "core" or "specialty" as defined by part 142. Once a curriculum is approved by the TCPM, it is listed in the center's TS specs as a core or a specialty curriculum/course. For an operator to use a center-developed curriculum it must submit the curriculum to its POI for approval. The procedure for approving a center-developed curriculum is the same as if the operator had developed the curriculum or paid a consultant to develop the curriculum. The important point to remember is that when the subject curriculum/course is approved by the operator's POI, it becomes part of the operator's training program and as it relates to the operator, it ceases to be either a core or a specialty curriculum.

2) Once the subject curriculum/course is approved by the operator's POI, the center, when conducting training for the operator, should refer to the subject curriculum by the name given to it by the operator. It is important to note that the training center should not refer to the operator's program as a specialty curriculum. This naming convention is important to clarify oversight and ownership responsibilities for the subject curriculum/course. An operator's programs are approved by its POI in accordance with the appropriate operating rule.

a) Training center curriculums, both core and specialty, are approved by a TCPM in accordance with part 142 and designed to meet the training, testing, and checking requirements of airmen certification under part 61 or 63.

b) The flightcrew member requirements of parts 91K, 121, and/or 135 differ in numerous respects to part 61 requirements. A TCPM's approval of a center's curriculum does not enable an operator to use such curriculum without the specific approval of the operator's POI.

3) In order for an operator to request a training center's approved curriculum to be incorporated into their program, the operator must first complete a comparison between the proposed center's curriculum to their approved curriculum. All differences must be noted and a training module developed to bridge the differences. This training module will be used to qualify the center's instructors and/or TCEs on the operator's curriculum. It is the operator's responsibility to ensure all center instructors and/or proposed contract check airmen receive training on the differences module(s) developed as a result of the curriculum comparison before they may be authorized as contract instructors or contract check airmen for the operator.

4) The operator may find that a center's curriculum may be used without change but that there may be minor differences in operating procedures and/or checklists. As part of the standardization and audit process, the operator must determine all differences between their curriculum and the center's. If the differences found are minor, the operator's POI may authorize the operator to develop a briefing guide outlining the differences as a suitable method to provide the training necessary to qualify the center's personnel. Major differences between the curriculums will require specialized differences or formal retraining of the center's personnel. In all cases, the operator's regulations require contract instructors and check airmen to be trained in the approved methods, procedures, and limitations for performing required normal, abnormal, and emergency procedures appropriate to the curriculum segment.

5) Operators must have training policies and procedures in their operations manuals or training programs that describe their SOPs and type of operation(s). At a minimum, operators that apply to contract a portion of their required crewmember training to an authorized provider must have policies and procedures in place that clearly identify the following:

a) This portion of the operator's program must clearly define these functions and their procedures to ensure adequate training is conducted and recorded.

b) SOPs, including but not limited to:

- Crew coordination and "callouts,"
- Maneuver descriptions and aircraft configuration,
- Flight deck "flows,"
- Checklist procedures,
- Autopilot use and crew coordination,
- Crew Resource Management (CRM), and
- Approach procedures (including approach charts, crew briefing, Electronic Flight Bag (EFB) use, etc.).

6) POIs and operators must be aware that training center-approved curriculum are designed to meet the certification requirements of parts 61 and 63 and are not required to include operator-specific items required by part 91K, 121, 125, or 135 training regulations. Part 142 training-center-developed curriculums are required to meet the certification requirements of parts 61 and/or 63 and the associated PTS or ACS. Consequently, part 142 training center curriculums will not comply with the operating rules governing an air carrier and by default do not contain or reference operator-specific requirements or the limitations/authorizations contained within an operator's OpSpecs/MSpecs.

7) If an operator is introducing a new aircraft and requesting the adoption of a center's curriculum in support of the introduction, the operator is responsible for ensuring the proposed curriculum meets their operational requirements. Additionally, the operator must:

a) Evaluate the proposed curriculum and submit it to their POI for approval/acceptance.

b) Develop a module(s) outlining any operator-specific training required to qualify center personnel as contract instructors and or contract check airmen based on the POI's authorized curriculum.

c) If a contract check airman is being proposed, the operator must provide the selected individual with any operator-specific training identified during the curriculum approval process.

d) Submit an appropriate contract check airman request to their POI a minimum of 15 business-days prior to the proposed use of the contract check airman.

8) Table 3-122A, Sample—Weight and Balance Curriculum Module Comparison Chart, provides an illustration of the differences that normally occur when an operator completes a comparison and evaluation of a Weight and Balance (W&B) training module that was designed for a part 142 training center against one designed for an air carrier. The table also illustrates the complexities typically encountered by an operator when conducting a curriculum comparison between their approved training program and that of a training center.

9) Column A in Table 3-122A lists the elements normally associated with an approved part 142 W&B training module. Column B represents a typical part 135 W&B training module. These differences are a result of the requirements of § 135.293(a)(3), which require operators to train and check their pilots on their (the operator's) method of determining compliance with W&B limitations. Part 142 requires the center's curriculum to comply with part 61, § 61.155(c)(9), which is typically modeled after the manufacturer's procedures. When confronted with these differences, an operator must decide to either:

a) Train and qualify the center's instructors to enable them to conduct the operators approved W&B training module; or

b) Providing there is no negative training involved, permit the center to conduct the manufacturer's weight, balance training, and then conduct a specialized course designed to cover the differences between the center's curriculum and that of the operator. If the operator chooses to permit the center to conduct the center's W&B module, the operator would then be required to convene a separate instructional period to train and test the differences between the center's curriculum and its (operator's) W&B curriculum. This differences training would be required prior to releasing any crewmember for line operations.

c) As mentioned in subparagraph C9)a) above, the operator could elect to provide W&B training to one of the center's instructors in those elements of their curriculum that are different from the center's curriculum. It would then be possible for the qualified instructor to conduct the entire W&B module for the operator's crewmembers. However, without specified training in the operator's procedures, the center may only be authorized to provide training and testing in those subjects that are part of the center's curriculum (Table 3-122A, lines 1–4). In either case, operators must develop a quality control program that will ensure their entire curriculum is conducted in accordance with their approved procedures and conducted by qualified individuals. The Instructor/Check Airman Standardization Program located on the AFS-280 website has been designed to provide assistance in this area.

**Table 3-122A. Sample—Weight and Balance Curriculum Module Comparison Chart**

	<b>Part 142 Training Center Curriculum Module and Elements [§ 61.155(c)(9)]</b>	<b>Part 135 Operator Curriculum Module &amp; Elements [§ 135.293(a)(3)]</b>	<b>Equivalent Training Yes/No</b>
1	Aircraft Manufacturers Weight & Balance Procedures (Airplane Flight Manual (AFM))	Aircraft Manufacturers Weight & Balance Procedures (AFM)	
2	Definitions	Definitions	
3	Limitations	Limitations	
4	Load Shift/Fuel Management and Use	Load Shift/Fuel Management and Use	
5		Operations Specifications (Paragraph A096, A097, A098)	No
6		FAA AC 120-27E	No
7		Carry-on Baggage identification and load and storage	No
8		Passenger Weight determination—average, surveyed, actual	No
9		Baggage/cargo weight determination	No
10		Cabin Configuration and loading	No
11		Baggage Compartment loading and security	No
12		Air Carrier Computation method (computer)	No
13		Manifest preparation	No
14	Testing Module	Testing Module	
<p>Row Number:</p> <p>1: Topic may comply with the operator's approved curriculum. However, the use of company-developed flip charts, computers, "WIZ Wheels," etc., may require specialized training. Differences evaluation required.</p> <p>2 through 4: Topics may comply with the operator's approved curriculum. Differences evaluation required.</p> <p>5 through 13: Topics do not conform to the operator's curriculum.</p> <p>14: Applicable to the particular curriculum. Differences evaluation required.</p>			

**10)** The curriculum an operator submits for approval to its POI must contain sufficient detail to assure all required training is addressed. The operator is responsible for submitting the subject curriculum to its POI for review, approval/acceptance, and subsequent inclusion in its training program, before any training is accomplished by the training provider.

**11)** This document will be jointly developed by the training provider and the operator, and will specify the division of all tasks required for training/testing/checking between the training provider and the operator. (Other equivalent methods that specify the division of tasks may be acceptable.) The operator bears the primary responsibility to ensure that all ground and flight training required by their specific operating rule is conducted and appropriately evaluated. The POI's oversight responsibility is to ensure that the operator's compliance efforts are satisfactory. The POI should check signoffs (certifications) of ground training and all testing for completeness, and should cross-check those signoffs against the source document showing the division of tasks. For example, part 135 operators must ensure the training required by § 135.345 is conducted and all subjects required by §§ 135.293, 135.297, and 135.299 are evaluated. A properly executed standardization document between the operator and the training provider will provide guidance to both parties concerning the training and testing/checking obligations for each party. A sample Instructor/Check Airman Standardization Program is located on the AFS-280 website.

NOTE: Training centers are not certificated as air carriers or commercial operators and are not issued OpSpecs/MSpecs. The operator-specific requirements of an air carrier's operating regulations make it impossible for a part 142 training center to have a training curriculum approved under those regulations. TCPMs may only approve training center curriculums that comply with part 142. Training centers may develop curriculums designed to comply with the operating rules of an air carrier; however, the curriculums cannot be approved as "meeting" the requirements of those parts. Training center instructors and evaluators are likewise qualified in accordance with a center's approved curriculums and therefore cannot conduct an air operator's training without first being qualified by an air operator before conducting any of the operator's required training. (Refer to §§ 91.1089 through 91.1095, §§ 121.411 through 121.414, and §§ 135.337 through 135.340.) Depending on the content of a particular center's instructor/TCE training curriculum, an operator may be able to credit a portion of the center-provided training as meeting some of their required instructor/check airman training requirements.

**12)** When a center revises one of their core or specialty training curriculums that originally formed the basis of an operator's approved curriculum, the center should be encouraged to advise the operator of the revision. However, it is important to understand that revisions to a center's core or specialty curriculums, which were used as the basis of an operator's training curriculum, does not automatically create a revision to the operator's POI-approved course. The adoption of such changes is subject to the operator's evaluation and approval by its POI. Center revisions that are considered appropriate for the operator's program may be incorporated by the operator if approved by the operator's POI. Likewise, the operator may make changes to its curriculum, in which case they must notify the center and ensure that all contract instructors and contract check airmen are trained in the new procedures (differences). Operators must be especially vigilant to ensure that changes to the training center's core or specialty curriculums do not affect the training they receive.

#### **D. Air Carrier Training at Multiple Training Centers.**

1) Occasionally, an air carrier will request that training be conducted at two or more training centers. These centers may be owned by the same parent company, satellite centers of the same certificate holder, or may be training centers operated by different companies. It is common practice for training centers operated by different owners/companies to take varied approaches to curriculum design and development for the same aircraft M/M/S. These differences often include training equipment, training hours, maneuver description, operating procedures, and checklists. When evaluated individually, each variant may be perfectly acceptable for the specific aircraft; however, as training products for an air carrier these differences, although subtle, are not consistent with the standardization requirements demanded by air carrier regulations. To ensure standardized training is provided, it is essential that before authorizing the use of multiple sources of training, the air carrier and subsequently the POI determine that the same curriculum and syllabus, including courseware, flight training equipment, maneuver descriptions, procedures, checklists, etc., will be conducted by each provider.

2) Subtle differences between or among training providers may not create standardization difficulties for noncertificated operators. However, because air operators are required to have their own approved programs, differing curriculum between or among training providers is not authorized. Training conducted by different centers will present a standardization problem if not properly monitored and managed by the operator.

3) To qualify a center's personnel to conduct an operator's training curriculums will require the operator to conduct an evaluation of the center's curriculums to determine what, if any, differences exist between the two and provide center instructors and evaluators training in those differences. This process must be repeated for each center authorized to conduct training for the operator. If a contract check airman is requested, the additional training appropriate to the operator's check airmen training will also have to be completed.

4) If POIs have reason to believe that multiple centers can provide the quality training required by the operator's approved curriculum, they may authorize two or more facilities or training companies to conduct the subject training. However, if the POI suspects that an operator curriculum cannot be adequately presented at multiple centers due to differing delivery methods, FSTDs training hours, maneuver descriptions, qualified personnel, etc., and/or the operator's ability to adequately monitor and audit the training being provided, the POI and the operator have the responsibility to limit the number of training providers.

#### **E. Training Policy and Procedures.**

1) Operators are required to develop and document, as part of their approved program, adequate procedures and policies to ensure all training providers conduct the operator's crewmember training as approved. These procedures may be part of the operator's manual used by the certificate holder's flight personnel in conducting its operations and/or contained in the operator's approved training program.

2) Operators must establish training policies and procedures to ensure crewmembers are trained and evaluated in accordance with the policies and procedures that represent the manner in which it conducts its aircraft operations. It is unacceptable to have differences between training/checking and actual aircraft operations or between individual crewmembers.

3) POIs are not to approve requests for outsourced training unless the operator's program contains appropriate policies and procedures to ensure the training conducted by the authorized training provider(s) is in accordance with the operator's approved program.

NOTE: Operators must ensure that approved training providers are provided at least one copy of their operating manual(s), including the revision service for such manuals, which cover the particular areas that the training provider has been approved to conduct. The operator must also ensure the training provider maintains a "read file" specific to the operator that is available to all contract instructors, contract check airmen, and the operator's crewmembers. This read file must contain information pertinent to their flight operations and crewmember operating procedures. Refer to the Instructor/Check Airman Standardization Program on the AFS-280 website for additional information.

4) An operator that determines a center-developed curriculum is suitable for its use must receive its POI's approval to integrate the subject curriculum into its training program. See subparagraph 3-4414C for policies and procedures for the integration of a center's curriculum into an operator's program.

#### **F. Crew Pairing.**

1) Training centers often provide services to air operators, which must meet requirements of particular operating rules (i.e., parts 91K, 121, and 135). Under these rules, training programs include checklists, callouts, profiles, approach procedures, and other features that are approved for the specific air operator by its assigned POI. Occasionally an operator may not be able to assign a complete crew for its training/checking/testing activities at part 142 training centers. When this situation occurs, the training center may provide a qualified crewmember that meets the requirements outlined in the operator's training program.

2) The FAA promotes the crew concept in air carrier training and checking to ensure that crew coordination and other flight management issues are adequately and appropriately addressed. Flight training must address the performance of duties as Pilot Flying (PF) and pilot monitoring (PM) as described in the air operator's approved procedures. To meet both of these seat-dependent training needs, each required flight deck crew position must be occupied by a qualified crewmember.

3) It is desirable that each flight training session be scheduled so that two pilots from the same company or air operator may be trained during a single flight training session. The preferred crew pairing is a pilot in command (PIC) and a second in command (SIC). Other acceptable crew pairings are two PICs or two SICs employed by the same certificate holder. Each pilot receiving training should have completed the appropriate aircraft ground training, including basic indoctrination, prior to beginning the flight training segment.



4) Permissible crew pairings. Some air carriers often operate with small pilot rosters or with pilots who are widely dispersed. Providing the operator's training program does not otherwise restrict crew pairings for flight training/checking/testing in a FSTD at a training center, the center may use the following guidelines when determining who may be considered an appropriate crewmember.

a) An appropriate crewmember must be one of the following:

1. One of the air carrier's line qualified pilots,
2. One of the air carrier's pilots undergoing training for the same aircraft, or
3. A contract flight instructor (airplane or simulator) or a contract check airman (airplane or simulator) who is authorized to serve in that air carrier's training program.

b) The following conditions apply when a part 135 air carrier pilot is training in an FAA-approved training program for another part 135 air carrier, whose training program is essentially similar.

- When the training curriculums are not essentially similar, pilots may not be paired; similarly, when operational differences between carriers are too pronounced or too numerous, at the discretion of the appropriate POI, pilots may not be paired.
- Each air carrier pilot must be trained in accordance with the training program approved by the POI of his or her own air carrier.
- Minimum equipment lists (MEL), OpSpec/MSpecs, and other features specific to each air carrier's operations must be addressed during flight training.
- When only one pilot is receiving flight training, the other pilot seat must be occupied by a person who is line qualified or line familiar in the specified duty position (refer to the current edition of Advisory Circular (AC) 120-35, Flightcrew Member Line Operational Simulations: Line Oriented Flight Training, Special Purpose Operational Training, Line Operational Evaluation, for definition of terms), unless the flight training is being conducted for single pilot operations.

NOTE: Training programs may be viewed as essentially similar when they include the same curriculum, the same checklists, and the same callouts and include flight deck configurations, operational procedures, and fms that are compatible in the judgment of the appropriate POI.

c) Pilots must have completed the operator's applicable ground training curriculum segments prior to starting the flight training curriculum segments.

5) Pairing pilots in flight training and evaluation for operations under different parts. When pilots from different operators are paired in training programs that are essentially similar, the operator-specific features (such as MELs and OpSpecs/MSpecs) of each operator must be addressed. Pilots in training for part 135 operations should not routinely be paired with pilots training for operations under part 91. These crew pairings should be avoided in favor of the pairings outlined in subparagraph 3-4414F4). However, such crew pairings are permissible provided the following conditions are met:

a) The part 91 pilot must conform to the training program of the part 135 pilot in every respect. Specifically, checklists, profiles, approach procedures, and callouts must be those used in the training program of the part 135 pilot (not vice versa), and the part 91 pilot must understand and apply CRM principles in accordance with the air transport pilot PTS or ACS, as applicable.

b) Each certificated air operator's crewmember must complete the appropriate air operator's evaluation module. Part 135 pilots may support the part 91 pilot's training activities as appropriate.

c) Part 91 pilots paired with an air operator crewmember must use the operator's approved curriculum. In these cases, the TCPM must either concur with the part 91 pilot's use of the air operator's curriculum to complete required training and currency, or approve a documented process submitted by the training center that ensures all requirements described herein are met. The training center should maintain records of such pairings in sufficient detail to allow FAA inspectors to easily determine compliance with the applicable regulation, operator's crew pairing procedures (if provided), and these requirements.

d) The part 91 pilot must have received differences training in the features of the part 135 training curriculum that distinguishes it from the part 91 training curriculum. That training should also include the operator's OpSpecs and operational control procedures.

NOTE: In crew pairings involving pilots of different part 135 operators or pilots operating under different operating rules (parts 135 and 91), POIs and TCPMs must be especially vigilant. The part 135 operator's training program must not be distorted or diminished in order to accommodate dissimilar training needs. If the integrity of the air carrier training program cannot be upheld, the crew pairing must not be permitted.

#### **G. Recordkeeping.**

1) Regulations require an operator to maintain training and qualification records for each crewmember, flight instructor, and check airman. This requirement includes contract instructors and contract check airmen employed by training providers that are authorized to provide training and checking for the operator. The means and methodology of maintaining required crewmember records must include an acceptable process to record training, checking, and qualifications of the operator's crewmember training conducted by an outsourced training provider. The operator's training program should contain a description of their recordkeeping system, as well as describing what records are to be used to comply with each regulatory

requirement. If the operator wishes to use an electronic recordkeeping system, the current edition of AC 120-78, Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals, provides guidance for the evaluation and approval of these systems.

2) Operators and training providers must establish and document procedures to ensure they have a clear understanding of their individual responsibilities for complying with required training and testing/checking recordkeeping requirements. These procedures must include identification of responsible personnel and approved location(s) where specific records will be maintained.

3) Training conducted by center personnel must be documented in accordance with the operator's approved system. Center personnel acting as contract instructors and/or contract check airmen for the operator must also be trained in the operator's records system.

4) Training centers are not required under part 142 to maintain an air carrier's crewmember training records when the training was accomplished in accordance with the operator's approved program. Training centers are only required to maintain the records required to support the training accomplished under part 142 that leads to airman certification or proficiency required by part 61 or 63. An operator's crewmembers are not trained and evaluated in accordance with part 142. They are trained and evaluated in accordance with the operator's operating regulations and approved curriculums. Therefore, the responsibility for record maintenance remains with the operator. Training centers that have been authorized to provide training for an operator are considered to be an integral part of that operator's training program. In that context, FAA policy permits the center to be used as a suitable location for required records if approved by the operator's POI. Many training centers provide a large portion of an operator's training and in some cases are the sole providers of such training, which may make the center a logical location for such records.

5) Part 142 requires training centers to maintain the training records of their instructors and TCEs. When these individuals are also approved as contract instructors and/or contract check airmen for an operator, it may also make sense for the operator to have its instructors and/or check airmen records maintained by the center. It is, however, the responsibility of the operator to ensure that all crewmember records are readily available for inspection as required by applicable regulations.

6) Operators must ensure that training records developed and maintained by their training providers are readily available to the operator. Records of crewmember training and checking are required to be furnished to the operator upon completion (within 24 hours) of any training and/or checking in order to enable the operator to determine qualifications for crew assignment(s). Training and qualification records for contract instructors and contract check airmen must also be made readily available to the operator.

7) In many cases, the TCPM will be the best qualified individual to assist the POI with required inspections, proficiency checks, and observations of assigned operators. Properly maintained records will also enable the TCPM and training centers to provide information on instructors and TCEs to other operators that may need instructor and evaluator assistance.

8) A TCE who is authorized as a contract check airman may be approved by one or more POIs to conduct checks for multiple operators that have contracted with a training center. This may occur when multiple operators of the same aircraft type have contracted for training at the same center and are using essentially the same curriculum.

9) Although not required, training centers that maintain contract check airman records for operators may be a good source of information for other operators who are evaluating center personnel as potential contract check airman.

10) Training centers must have a process whereby they keep customers apprised of all training or checking conducted on the operator's behalf. Additionally, the center must notify the operator within 24 hours if there is a job functions status change with a TCE or instructor who is also a contract check airman or contract flight instructor for the operator that may affect the individual's check airman or instructor status with the operator.

11) TCPMs are responsible for maintaining eVID information regarding the training center, its instructors, and evaluators. POIs are responsible for maintaining eVID files pertaining to each training center employee authorized as a contract check airman.

### **3-4415 REQUIREMENTS TO AUTHORIZE CONTRACT FLIGHT INSTRUCTORS AND/OR CONTRACT CHECK AIRMEN FOR AN AIR OPERATOR.**

**A. Requirements.** Sections 91.1073(a)(4), 91.1075(b)(4), 121.401(a)(4), 121.402(b)(4), 135.323(a)(4), and 135.324(b)(4) require operators to provide enough flight instructors and check airmen to conduct the flight training and flight checks required by the applicable operating rules.

1) The determination of a "sufficient" number of contract check airmen and/or contract instructors for a particular operator will require a careful evaluation of the following:

- Number of APDs authorized by the FAA and employed by the operator;
- Geographic location of the operator with respect to available FAA support;
- The operators understanding that they are required to provide surveillance and supervision of their contract instructors/check airmen;
- Availability of FSTDs and location relative to the domiciles of the operators' crewmembers; and
- Operators required crewmember training and evaluation workload.

2) There is no fixed formula that will definitively answer the question of how many contract check airmen/instructors are appropriate. Maintaining an equitable balance between the operator's ability to provide required management oversight and surveillance, while meeting their evaluation requirements without compromising standardization or safety, is a primary concern.

**B. Qualification and Training Requirements.** The qualification and training requirements for individuals to become contract flight instructors and/or contract check airmen for an air carrier are outlined in the specific regulations governing the type of operation (specifically part 91K, part 121 subpart N, and/or part 135 subpart H, as appropriate). Training center instructors and evaluators are trained and qualified under part 142, which does not mirror the instructor and/or check airman qualification requirements of an air carrier. Although some of the instructor/evaluator training required by part 142 may be considered equivalent to the instructor/check airman training required by an air carrier, the two currently do not align. The differences between these two regulatory requirements will generate additional training requirements for training center instructors and evaluators selected to provide training and checking services for operators.

**C. Instructors.** Consider the case of a part 142 training center flight instructor (simulator) who is qualified to provide instruction under the training center's approved core curriculum for a particular aircraft.

1) In order for a training center instructor to serve as a flight instructor for an air carrier, the individual must be trained and qualified to instruct in each training segment, module, or element of the air carrier's curriculum that the instructor will be responsible for providing to the air carrier's crewmembers. Current policy does not require center instructors to complete the carrier's entire approved training program or curriculum provided:

a) The individuals are limited to conducting only the training elements of the operator's curriculums that they have been specifically trained and qualified to conduct and have been authorized by the operator; or

b) The individual has previously received the same training, proficiency/competency checks, and observations in the same M/M/S aircraft for another air carrier operating under the same part.

2) Situations where an air carrier adopts a training center's core or specialty curriculum(s) and the POI approves these curriculums as part of the air carrier's training program would also mitigate some of the training required by the operator to qualify the subject instructor. In this situation the only training the air carrier would be required to provide the center's instructor(s) would be limited to any differences that exist between the training center's curriculum(s) (as approved by the TCPM) and the air carrier's training curriculum (as approved by the carrier's POI).

NOTE: In such cases, it is the air carrier's responsibility to identify each difference between the carrier's approved training curriculum (including curriculum content, checklists, and procedures) and the training center's curriculum. The air carrier must then develop and provide their POI a training module to qualify the center's personnel on all noted differences. This differences training module must be approved by the POI prior to conducting the subject training.

3) The air carrier's POI has the responsibility to determine if the manner and method proposed by the air carrier to train and qualify the center's personnel on curriculum differences, will meet the operator's training requirements.

**D. Review.** To ensure the center's personnel meet the operator's check airman standards, the operator will need to review the individual's training history and qualifications.

1) Elements of the center's instructor/TCE training curriculums that the operator finds equivalent to their training program may, with the POI's approval, be credited toward the completion of the operator's instructor/check airman curriculums. If the center's curriculum has been submitted to the POI for approval and is approved as meeting the requirements of the operator's curriculum, other than the operator-specific items, no additional training for the center's personnel would be required. Any differences or deficiencies noted will require the operator to develop a training module to ensure all regulatory requirements are met in order to qualify the center's personnel as contract check airmen.

2) In addition to the instructor qualification and testing requirements outlined in subparagraphs 3-4415B and C, operators must accomplish the following to qualify an individual as a contract check airman:

a) Evaluate the instructor/TCE's credentials to ensure he or she meets the certificate holder's requirements to become a contract check airman.

NOTE: Individuals must have at least one year of experience as a center instructor or TCE in the make and model (M/M) aircraft in order to be considered as a contract check airman for an operator. POIs are encouraged to contact the center's TCPM for assistance with the review and potential approval of contract check airmen. TCPMs are often the POI's best source of information relating to a center's operation and personnel.

b) Evaluate the center's instructor and TCE training curriculum by comparing it to the operator's check airman curriculum to determine the differences training required to qualify the center's personnel as a contract check airman.

c) Develop an appropriate differences training module(s) to include the operator-specific elements of the check airmen qualification and training/checking regulations to qualify the center's instructor/TCE as a contract check airman.

d) Submit the contract check airmen training module(s) to its POI for acceptance/approval.

e) If the training course is approved, ensure the course is provided to all contract check airmen candidates.

f) Provide the POI with complete training records and submit the individual's name and résumé for review and approval in accordance with Volume 3, Chapter 20.

g) If the applicant is approved as a contract check airman, the POI will make the necessary eVID entries.

NOTE: POIs should notify the center's TCPM whenever they authorize one of the center's personnel to act as a contract check airman. This may be accomplished by forwarding the TCPM a copy of the check airman's LOA. A sample contract check airman LOA is located on the AFS-280 website.

**E. Categories of Authorization.** The standard categories of authorization for check airmen currently shown in Volume 3, Chapter 20 do not provide the level of specificity required for the approval of contract check airmen. For example, an operator's check airman, qualified as a line captain may be authorized as a simulator only check airman permitting him or her to administer both § 135.293(a)(1) through (9) as well as § 135.297 evaluations. A contract check airman who is only qualified in the aircraft-specific modules of an operator's curriculum may be authorized to conduct simulator-only evaluations; however, he or she would be limited, due to his or her training, to evaluations of § 135.293(a)(2) and (b) and § 135.297 evaluations. Unless the contract airman is qualified in the operators complete curriculum for the specific aircraft, he or she may not be authorized to conduct the elements required by § 135.293(a)(1) or (a)(3) through (9). Other restrictions may also apply depending on the training and qualification provided by the operator. A sample contract check airman LOA is located on the AFS-280 website.

#### **F. Training of Instructors and Evaluators.**

1) Because the typical training program offered by the training center currently does not include all of the ground training subjects contained in an operator's curriculum, it follows that neither the trainees nor the instructors and evaluators themselves receive training in those subjects. It is important to ensure all training center instructors and evaluators are trained and evaluated in all subjects that the center is contracted to conduct. For example, because the typical training program offered by the training center currently does not include ground training in the subjects contained in § 135.293(a)(1) and (a)(4) through (9), it follows that neither the trainees nor the instructors and evaluators themselves receive training in those subjects. Therefore, a TCE typically is not qualified to evaluate subjects other than those contained in the center's core curriculum, which equates to § 135.293(a)(2) and potentially (3). Similarly, a trainee should not be evaluated in those subjects by individuals not qualified in the operator's procedures.

NOTE: To preclude any confusion concerning a contract check airman's authorization, the POI must specify in each contract check airman's LOA what specific subjects the check airman is authorized to test and check.

2) Particular caution must be exercised to ensure that individuals being nominated by an air carrier to become contract instructors/check airmen have a good understanding of the issues typically faced by crewmembers on a daily basis, many of which are learned only through the completion of an air carrier's initial new-hire training curriculum. Knowledge of an air carrier's operational environment becomes very important when instructors/check airmen may be required to draw upon that knowledge to ensure that the quality of training and evaluations demanded by the regulations is not compromised. Non-aircraft-specific issues such

as flight following/dispatch, MEL/Configuration Deviation Lists (CDL), cabin crew/flightcrew interactions, hazmat, security, company SOPs, etc., play an important role in a crewmember's training; especially during Line-Oriented Flight Training (LOFT) events. To effectively function as an air carrier instructor/evaluator, individuals must have a good understanding of these issues.

3) Before an air carrier authorizes a contract instructor or nominates an individual to become a contract check airman, the air carrier must provide its POI with evidence that these individuals have completed at least one air carrier's initial training and qualification curriculum as a flightcrew member for an operator certificated under the same 14 CFR part. Providing the operator and the assigned POI find this training and qualification acceptable, individuals may be considered to have met the non-aircraft-specific training requirements to become a contract instructor/check airman. The completion of an operator's line check requirement(s) is not required. Following the completion of an appropriate differences training curriculum, the subject individuals may be authorized as contract instructors and nominated to become contract check airmen. This process should preclude an individual from conducting training and checking in an air carrier environment without ever having had the benefit of, at a minimum, the training required to qualify an individual to act as required crewmember for an air carrier.

**G. Proficiency Evaluations.** The proficiency evaluations required by an air carrier to qualify and maintain the currency of its check airmen are also applicable to center personnel that are being nominated as contract check airmen for the operator.

NOTE: TCPMs are only required to verify that the center's TCEs receive annual training on the conduct of part 61 certification functions in accordance with part 142 subpart C, relating to the curriculums approved for the training center's use. As outlined above, this training and checking does not qualify an individual to act as an operator's check airman. Operators must complete a detailed comparison between its check airman curriculum and that of the training center's TCE curriculum to determine the extent of the additional training they must provide to qualify the center's personnel to act as a contract check airman on their behalf. If this comparison indicates that the operator's training programs are identical, other than the operator-specific items, no additional training for the center's personnel is required. Any differences noted between the curriculums will require the operator to develop a training module to qualify the center's personnel as a check airman. This module must be presented to the operator's POI for approval/acceptance.

**H. Contract Instructors/Check Airmen.** Training center employees that have been qualified by an operator to serve as a contract instructor/contract check airman may be considered qualified to act in the same capacity for another operator provided that:

- 1) Both operators are certificated under the same 14 CFR part.
- 2) Both operators are operating the same M/M/S of aircraft with identical configurations.



3) Both operators are using identical training curriculums, including checklist and operating procedures.

4) The requesting operator finds the subject individual acceptable as a contract instructor/check airman.

5) The subject instructor/check airman has met the operating or observation experience requirements for at least one operator for which they are providing services. For example, if a training center instructor is qualified to provide instruction in a particular aircraft for three different operators, the instructor may be considered to have met the initial and recurrent line operating or observation requirements for all three by remaining qualified in one of the operator's programs.

NOTE: In all cases, the acceptance of an instructor/check airman's qualification by another operator is subject to the approval of the requesting operator's POI.

**I. Reports.** The POI should arrange to have the operator provide the POI with a periodic report of each check airman's checking activities, including a pass/fail rate, to coincide with the POI's periodic review (annual, semiannual, or other). POIs may arrange for these reports to arrive at a time that meets the POI's needs. A contract check airman should be active enough to retain the required knowledge and skills. This activity level may vary depending on the contract check airman functions and other operators for which he or she is authorized check airman activities, the size of the operator, and the number of approved check airmen. Usually a check airman should conduct at least eight authorized check airman activities during a 12-month period (including supervision of Operating Experience (OE)). The POI should specifically reassess the operator's need for those check airmen whose records indicate low activity levels.

### **3-4416 OUTSOURCED TRAINING PROVIDER AUDITS AND ASSOCIATED OPSPEC/MSPEC PROCEDURES.**

**A. Self-Audit Program.** The FAA requires a mandatory self-audit program for operators certificated under the provisions of part 91K and 14 CFR part 119 who contract with a training provider to conduct a portion of their required crewmember training. Such training arrangements are informally known as outsourced training. POIs will use OpSpec/MSpec/LOA A031 to record FAA approval of these contract training arrangements.

**B. Operator Responsibility.** The FAA is often limited in its ability to oversee an air carrier's training operations conducted under contract by a training provider(s). This oversight is the primary responsibility not of the FAA, but of the operator itself. The operator holds an air carrier certificate as a privilege granted by the Administrator on the presumption that the operator will continually maintain the highest safety standards, including flightcrew training standards. The operator must ensure that its flightcrew training conducted by a contractor continually meets the requirements set by regulations and the standards contemplated at the time of initial certification.

NOTE: The current edition of AC 120-59, Air Carrier Internal Evaluation Programs, recommends a voluntary self-audit strategy for air carriers that may

be readily adapted to continuing analysis and surveillance of outsourced flightcrew training.

**C. Self-Audit and Summary Report.** The self-audit and summary report cycle outlined in this section may be used as the first phase of a plan to implement more effective operator-driven quality assurance (QA) where outsourced flightcrew training is concerned. The cycle must be conducted at least every 24 months in accordance with OpSpec/MSpec/LOA A031, and should be conducted at any time that a major change affects the operator's outsourced flightcrew training.

**D. POI Verification.** POIs must verify that their operators arranging with training providers to conduct contract training for their crewmembers, otherwise known as outsourced training, will accomplish the following activities.

**1) Self-Audit.**

a) Training Program Components: Adherence to Approved Program.

The operator must document that the training program delivered by the training provider is identical to the training program approved for the operator's use by the POI.

The documentation will address at least the following:

- Manuals;
- The format and content of curriculums, curriculum segments, training modules, and documents depicting flight maneuvers and procedures;
- Courseware;
- Facilities; and
- Qualifications of instructors and check airmen.

b) Training Curriculums: Adherence to Approved Program. The operator must audit curriculums and document that those curriculums presented by the training provider adhere to the curriculums contained in its FAA-approved training program. The documentation must address at least the following, including ground training and flight training curriculum segments:

- Initial new-hire training;
- Upgrade training;
- Transition training;
- Recurrent training;
- Refresher training (part 121 only);
- Initial equipment training;
- Requalification training; and
- All other approved training such as differences, related aircraft differences (part 121 only), hazmat, security, and CRM, as appropriate.

c) **Flight Training and Testing/Checking: Adherence to Approved Program.**

The operator must observe all contract instructors and contract check airman who are conducting required instruction and evaluations on their behalf by center personnel. The operator must document that regulations contained in §§ 91.1089 through 91.1095; §§ 121.411 through 121.414; or §§ 135.337 through 135.340, as appropriate, are being met and that approved standards are being maintained. Documentation must address at least the following, as applicable:

- Certification flight checks;
- Proficiency checks, and instrument proficiency checks (parts 91 and 135 only);
- Flight checks (part 121 Flight Engineer (FE));
- Flight training in lieu of the proficiency check, including LOFT;
- Competency checks;
- Maneuver validation (Advanced Qualification Program (AQP)); and
- Line operational evaluations.

d) **Training Records: Completion of All Approved Training.** The operator must review required training and testing records to ensure compliance with their operating rule. This review must cover all of the operator's crewmembers, including pilots, FEs, and flight attendants (F/A) who have received outsourced training since the last review cycle. The operator must document that each crewmember has successfully completed all of the required components of training and checking comprised by its approved training program.

**2) Summary Report.** The operator must prepare a report, summarizing the findings of its self-audit. A sample report is on the AFS-280 website. This sample report form may be used to compile self-audit findings and to submit findings to the POI as a summary report. Another form mutually acceptable to the operator and the POI may be used instead. The summary report must be signed by the operator's director of operations. In all instances that discrepancies are found between the training program delivered by the training provider and that which is approved by the FAA, the operator must propose effective remedies. Those remedies must be included in the summary report and must be addressed under the following categories:

a) **Immediate corrective action:**

1. Action already taken, showing dates; and
2. Action planned, showing target dates.

b) **Long-term corrective action, showing target dates; and**

c) **A strategy for ensuring continuing prevention of recurrence.**

**3) OpSpec/MSpec/LOA A031.** All affected operators are required to be issued OpSpec/MSpec/LOA A031. Any training provider conducting contract training, within the meaning of this section, must be approved by the POI and recorded in OpSpec/MSpec/LOA A031.

**E. Program Discrepancies.** An operator contracting for training must address any training program discrepancy and undertake corrective action as soon as the discrepancy becomes known. When the operator's own remedies are insufficient, the POI must take additional steps as deemed necessary and appropriate, in accordance with applicable provisions of Title 49 of the Code of Federal Regulations (49 CFR), 14 CFR, this order, and the current edition of FAA Order 2150.3, FAA Compliance and Enforcement Program.

NOTE: For guidance in accomplishing an Internal Evaluation Program (IEP) evaluation, refer to AC 120-59 and Volume 3, Chapter 28, Section 1, Air Carrier Management Effectiveness.

**F. New Outsourced Training Arrangements.** When approving new outsourced training arrangements for part 91K use the regular PTRS recording procedures for the appropriate job function and enter "Contract" in the "National Use" field.

**RESERVED.** Paragraphs 3-4417 through 3-4432.